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*Attorneys for Defendants
William Hutchings and Kimberly McCoy*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DONALD TAYLOR,
Plaintiff,

v.

CHARLES DANIELS, *et al.*,
Defendants.

Case No. 2:21-cv-02011-RFB-MDC

**STIPULATION AND PROPOSED
ORDER TO EXTEND SCHEDULING
ORDER AND DISCOVERY
DEADLINES (SECOND REQUEST)**

Plaintiff Donald Taylor and Defendants William Hutchings and Kimberly McCoy, by and through counsel, Aaron D. Ford, Nevada Attorney General, and Nathan M. Claus, Deputy Attorney General, hereby submit their Proposed Stipulation and Order To Extend Scheduling Order And Discovery Deadlines as ordered by this Court during a hearing on February 14, 2024. [ECF No. 41]. The parties met and conferred on March 12, 2024.

I. DISCOVERY COMPLETED

The Parties have been diligently conducting discovery and continue to conduct discovery. Defendants provided their initial disclosures on July 5, 2023. Plaintiff has propounded five sets of Requests for Production of Documents on each of the Defendants, which have all been responded to. Plaintiff has also propounded Requests for Requests for Admission to Defendant Hutchings and those responses were mailed on October 23, 2023.

1 Defendants most recently supplemented their initial disclosures on or about February 14,
2 2024.

3 **II. DISCOVERY THAT REMAINS TO BE COMPLETED.**

4 Plaintiff has indicated that he will be sending more requests for production.
5 Defendants will likely be sending discovery requests to Plaintiff.

6 **III. REASON FOR THE REQUESTED EXTENSION**

7 Pursuant to the hearing on February 14, 2024, the Court ordered the parties to get
8 together to decide how much time was needed for discovery and then submit a new
9 discovery plan/scheduling order (ECF No. 41). After a diligent and frank discussion, the
10 parties have concluded that 180 days of additional discovery would serve the best interests
11 of the case. The Parties bring this proposed scheduling order request in good faith and not
12 for any purpose of delay.

13 **IV. PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING**
14 **DISCOVERY**

15 a. **Discovery Cut-Off Date:** The discovery cut-off date shall be rescheduled
16 from April 1, 2024, to September 30, 2024.

17 b. **Dispositive Motions:** The deadline to file dispositive motions shall be
18 rescheduled from May 1, 2024, to October 28, 2024.

19 c. **Pretrial Order and Disclosures:** In accordance with Local Rule 26-1(b)(5),
20 the last day to file the Joint Pretrial Order (including the disclosures required by Fed. R.
21 Civ. P. 26(a)(3) and any objections thereof) shall be rescheduled from June 3, 2024, to
22 December 2, 2024, if no Dispositive Motion has been filed, otherwise from thirty (30) days
23 after the decision of the dispositive motions or further order of the Court.

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V. CONCLUSION

Based on the above, good cause exists to warrant a one hundred eighty (180) day extension of the discovery and dispositive motion. Accordingly, the Parties respectfully request that this Court extends the current deadlines by one hundred eighty (180) days in order to allow Parties to adequately complete discovery.

DATED this 14th day of March, 2024.

DATED this 14th day of March, 2024

AARON D. FORD

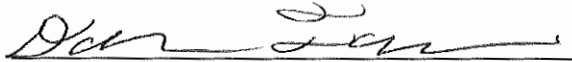
Attorney General

/s/ Nathan M. Claus

NATHAN M. CLAUS (Bar No. 15889)

Deputy Attorney General

Attorneys for Defendants



Donald Taylor, #1117274

Plaintiff, Pro Se

ORDER

IT IS SO ORDERED:

DATED: 3-21-24


UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I certify that I am an employee of the State of Nevada, Office of the Attorney General, and that on March 19, 2024, I electronically filed the foregoing Stipulation and Proposed Order To Extend Scheduling Order and Discovery Deadlines via this Court's electronic filing system. Parties who are registered with this Court's electronic filing system will be served electronically.

Donald Taylor #1117274
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P.O. Box 650
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Plaintiff, Pro Se

/s/ Andrea Beckett
ANDREA BECKETT, an employee of the
Office of the Nevada Attorney General